



2 January 2002

Ron Burnett
Western Federal Lands Highway Division
Federal Highway Administration
610 East Fifth Street
Vancouver, WA 98661

Dear Mr. Burnett:

Montana Trout Unlimited and the National Wildlife Federation are asking FHA to consider our concerns and suggestions regarding certain elements of the project your agency is contemplating for Montana Forest Highway 56 (known as the Thompson River Road).

We have a special concern for the Thompson River corridor because of its wildlife, fishery, recreation and open space values. For example, Trout Unlimited has worked to help steer funding to the drainage for improving its native and wild trout fishery. This included helping to negotiate a settlement for relicensing two private dams on the lower Clark Fork that included funds for the Thompson River. In addition, both TU and NWF have supported state acquisition of conservation easements in the drainage so that water quality, open space and habitat could be protected. The largest of these efforts has been the conservation easement negotiated by the Trust for Public Lands and the Montana Department of Fish, Wildlife and Parks on several thousands of acres of Plum Creek Timber Company property, much of which abuts the river.

We agree with FHA that consolidating the current two roads into one is beneficial environmentally. Properly done, this would reduce sediment contributions to the Thompson River and some tributaries. It would also facilitate restoration of riparian habitat as well as stream and floodplain function. The Thompson River drainage is an important refuge for dwindling populations of native fish, especially bull trout and westslope cutthroat trout. Bull trout are listed as threatened by the U.S. Fish and Wildlife Service. Westslope cutthroats are a candidate for federal listing. The Thompson River drainage holds both resident and migratory forms of both species.

We also concur that bridges along Highway 56 should be upgraded so that they are safer and more environmentally protective. In order to better protect the aquatic community of the Thompson River and its tributaries, bridge spans should be constructed to pass large peak-flow events, thus facilitating channel forming flows and bedload transport. The same objectives should apply to culverts.

We share FHA's concern with reducing maintenance. However, we strongly disagree that paving the road to a 45-55 mph design speed is the best option for achieving this. Paving would promote increased commercial truck traffic between Highway 200 and Highway 2, thus increasing the risk of truck-related accidents and spills into the river. In addition, paving and the associated increase in high-speed commercial and private traffic would adversely affect local wildlife. Large game, including elk, bighorn sheep, moose, mule and white-tailed deer, black bear and federally listed grizzly bear, lynx and wolves currently use the Thompson River drainage. Additional high-speed traffic would likely lead to interference with critically important wildlife movement and also cause increased mortality. In the case of federally listed species, we believe such impacts constitute potential significant impacts and thus should trigger formal consultation with the U.S. Fish and Wildlife Service.

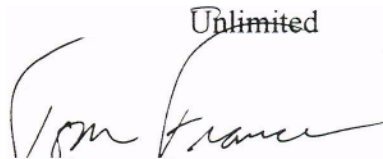
We also believe because there is as yet no demonstrated need for a high-speed paved road and because economic, environmental and private property costs would significantly increase with paving, that FHA should examine other options for improvements, including using native aggregate surface, judicious use of erosion surfactants such as magnesium chloride and thoughtful road realignments.

We look forward to discussing these concerns with FHA and its partners. We also request to be kept fully informed as the project progresses.

Sincerely,



Bruce Farling Executive Director
Montana Trout Unlimited



Tom France, Esq.
Director and Legal Counsel
Northern Rockies Resource Office
National Wildlife Federation

cc.
Montana Dept. of Transportation U.S.D.A. Forest
Service, Region I Lolo National Forest Montana Dept. of
Fish, Wildlife and Parks